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CITY OF SEATTLE

ANALYSIS AND DECISION OF THE DIRECTOR OF THE DEPARTMENT OF CONSTRUCTION AND INSPECTIONS

SEPA Threshold Determination

Neighborhood Parking Legislation

Project Sponsor: City of Seattle Department of Construction and Inspections

Location of Proposal: The amendments pertain to numerous zones citywide, including those in Urban Centers, Urban Villages, and other locations outside of those designated areas

DESCRIPTION OF PROPOSAL

This is a non-project proposal to amend parking rules and policies that would: promote more efficient use of parking in existing buildings and future development and on-street; and promote City land use, transportation mobility and accessibility, growth management, housing affordability, and climate protection policy objectives.

The proposal includes:

- Facilitating greater use of off-street parking resources, especially where currently under-used;
- Addressing future parking needs;
- Removing code barriers that impede the use of off-street parking in garages by a range of parking users, including in the Station Area Overlay District; and
- Clarifying code guidance where there are omissions.

By making it easier for the public to access off-street parking opportunities, growing areas would be better able to balance parking demands between on-street and off-street parking resources.

The proposal would also better define how transit service frequency is measured, and adopt a map for use in identifying areas with no parking requirement and areas with a reduced parking requirement.

The proposal includes revisions to parking-related policies in the City's State Environmental Policy Act (SEPA) Environmental Policies and Procedures in Chapter 25.05 of the Seattle Municipal Code. The policy updates would better recognize the linkages between land use and transportation policies in the City's planning and policy framework, as they relate to parking.

Key aspects of the proposal include:

MORE OFF-STREET PARKING FLEXIBILITY

A. Flexible-Use Parking: Create new rules and clarify how existing rules pertain to the use category of non-required, non-accessory parking in existing and future developments. Currently, most code provisions pertain to "required parking" and "accessory parking." Also, in several parts of the City, there is a zero-minimum parking requirement, and so all parking (unless it is defined as accessory or reserved) is likely to be non-required, non-accessory parking receiving little or no regulation under the Land Use Code. The proposal would extend allowed parking durations beyond the current "short-term" limits of 4 hours at a time in several zones, including the Station Area Overlay District. This proposed extension would allow for more sharing of parking by short-term users (shoppers) and long-term users (residential car storage, commuters). The term "flexible-use parking" would largely replace the Land Use Code term "principal use parking" that describes types of parking that are not accessory parking. Flexible-use parking would be permissible in Lowrise 3, Midrise, and Highrise residential zones, and would also be permissible in various commercial and industrial zones, including in garages in mixed-use development located in light rail station areas. Similar to existing restrictions, flexible-use parking would be prohibited in the South Lake Union Urban Center.

B. New maximum parking limits: As a complement to Item A above, a new maximum parking limit of 145 flexible-use parking spaces per lot would help manage neighborhood parking supplies, by limiting overprovision of flexible-use parking even as it provides drivers with enhanced parking flexibility and enables better balancing of neighborhood parking supply and demand on- and off-street. The proposal deletes a special exception in the Land Use Code that allows conditional provision of more parking than the maximum parking limit in Downtown zones.

C. Flexibility for non-Major institutional uses: Allow flexibility for less parking for public uses and institutions (non-Major) in frequent-transit-served areas. Currently, there is no minimum parking required for other kinds of non-residential uses in Urban Centers, the Station Area Overlay District, and frequent-transit-served areas, but institutional uses like adult-care or child-care centers, community clubs, libraries, museums, and religious facilities have minimum parking requirements. The proposal allows for such uses, except institutes for advanced study in single family zones and hospitals in all zones, to provide parking tailored to their needs, like other non-residential uses.

D. Update Northgate parking rules: Replace outdated Northgate parking provisions with the same rules that apply to other Urban Centers. The proposal would eliminate Northgate-specific parking rules that define different minimums and maximums for certain land uses such as office and retail sales uses, and other guidance, some of which is difficult or not possible to implement like payments in lieu of providing parking. These rules conflict with other Urban Center-oriented regulations and are not necessary, especially given other current or proposed parking provisions in the Land Use Code.

E. Expand distance allowed for off-site parking from the use it serves: Allow more opportunities for off-site parking arrangements by allowing required parking to be within 1,320 feet (1/4 mile)

instead of 800 feet. The 1/4-mile distance is an accepted urban design and transportation planning guideline for the distance an average person is willing to walk.[1]

CLARIFY HOW FREQUENT TRANSIT SERVICE IS MEASURED

F. Update the definition of Frequent Transit Service in a manner that is flexible and is more consistent with transit planning guidelines as used by King County Metro and the City. "Frequent transit service" is currently defined in Seattle's code as "transit service headways (time between scheduled bus arrivals) in at least one direction of 15 minutes or less for at least 12 hours per day, 6 days per week, and transit service headways of 30 minutes or less for at least 18 hours every day." Given the strict application of these time parameters, the City currently evaluates frequency by counting periods of transit service that explicitly meet this definition and does not count increments of time where headways exceed 15 minutes or 30 minutes depending on service timeframe. However, King County Metro's scheduling practices can result in longer scheduled headways (often by 1-3 minutes), for system operation reasons or to recognize typical traffic-related delays along routes. With the voter-approved November 2014 Proposition 1 and its more than 270,000 hours of additional coverage in Seattle, it is noted that bus service availability, daily span of coverage and consistency of scheduled headways has improved since early 2015.

To reasonably recognize transit service with a wider variety of time gaps between buses as sufficiently frequent, the proposal would allow for more flexibility in counting frequent transit service timing and total length of daily service by updating definitions and measurement criteria in a new Director's Rule. The proposed Rule would allow for counting bus transit (or other transit) service provided by one or more routes as frequent if: intervals between service of no more than 18 minutes provide service for at least 12 hours per day, 6 days per week with frequency of not less than four scheduled trips per every 1.1 hours, and intervals between service of no more than 35 minutes provide service for at least 17 hours, every day with frequency of not less than two scheduled trips per every 1.1 hours. The proposal also includes a new definition of "transit service headway."

The proposal would also implement a map of 1,320 feet (1/4-mile) walking-distance "walksheds" from frequently-served transit stops. The map in a Director's Rule would be updated periodically by SDCI staff to maintain its accuracy.

PARKING LOCATION AND DIMENSIONS

G. Allow surface parking for up to three car share vehicles in front or side setbacks in commercial zones, and in Midrise and Highrise multifamily zones. While current code restricts parking in these parts of properties, the proposal would allow car share vehicles off-street in visible, accessible places to support this travel option and slightly aid on-street parking patterns.

[1] Fairfax County Planning Commission TOD Committee. "Walking Distance Research" abstract with numerous study citations and government guideline references citing typical walking distance tolerances. Fairfax County, Virginia; undated.

H. Apply parking-space size requirements to non-required parking for residential and live-work uses. Current code for minimum parking space sizes does not recognize that most or all residential or live-work uses' parking on-site could be non-required parking. The code allows for residential and live-work uses' parking to be "any size" which removes applicability of any of the City's defined size of parking spaces — for small, medium or large vehicles. The proposed amendment would indicate that the sizing of such parking may be selected from among the size categories defined in SMC 23.54.030.A.

BICYCLES

I. Update bicycle parking requirements and performance standards, and consolidate bicycle requirements to apply to Downtown in the same way as the rest of the city. Currently, Downtown bicycle minimum parking requirements pertain to a much smaller list of land uses. The proposal would instead define a consistent set of requirements city-wide, and update the minimum amounts of bicycle parking required in selected categories. The proposal also clarifies performance standards for bicycle facilities' security, safety, lighting, wayfinding, and convenience; and it would extend a requirement for shower facilities for bicyclists to locations outside of Downtown for buildings larger than 100,000 square feet.

OTHER

J. Allow park-and-ride facilities within garages as a permitted use in certain zones, including Lowrise 3 and other denser multifamily zones, and in most commercial and industrial zones. This would encourage efficient use of underused garage parking resources and accommodate commuter-oriented parking, sponsored by a transit agency, in the vicinity of bus rapid transit hubs or along well-served transit corridors. However, this would not be a permitted use near light rail station areas.

K. Clarify parking rules and reduce minimum parking for income-restricted housing, including for the disabled. This proposal updates income categories and other technical references. The proposal reduces the parking requirement for low-income housing development, including those that are income-restricted and those serving the disabled. For example, this includes a reduction of minimums of 0.33 and 0.75 parking spaces per dwelling unit to a uniform 0.2 parking spaces per dwelling unit for the typical range of households present in most such housing (between 0 and 60 percent of area household median income).

L. In zones where flexible-use parking may occur, require a pedestrian access between the garage and a public right-of-way, to accommodate non-resident garage access and use.

M. Allow required parking amounts to be reduced in any zone except Downtown zones, to a level needed to serve a parking demand for proposed uses that is demonstrated by a parking demand study performed by a licensed professional engineer or transportation planner.

N. Require unbundling of parking space rental from multifamily dwelling unit rental agreements in new structures with ten or more dwelling units, and for rental and lease agreements for a range of commercial retail, service and office uses in buildings 10,000 square feet or more in size. Offering new residents a choice in whether to pay for on-site parking would support housing affordability and enable more efficient transportation choices to be made. Housing with income criteria would be exempt from this requirement. Similarly, giving the option for commercial tenants to lease less parking could lead to more efficient transportation choices.

O. The proposal includes revisions to parking-related policies in the City's State Environmental Policy Act (SEPA) Environmental Policies and Procedures in Chapter 25.05 of the Seattle Municipal Code. The policy updates would better recognize the linkages between land use and transportation policies in the City's planning and policy framework, as they relate to parking. This includes a reference to policies that support reducing or eliminating off-street parking requirements where residents and others may conveniently choose to use other forms of transportation instead of relying on automobiles. Also, the proposal adds new types of parking mitigation to this section: a subsidy for participation in car share or bike share programs or similar mobility choice programs.

ANALYSIS

The following describes the analysis conducted to determine if the proposal is likely to have a probable significant adverse environmental impact. This threshold determination is based on:

- The proposal, as described above;
- The information contained in the SEPA checklist and draft Director's Report, and other supporting materials;
- Additional information, such as research or analyses made by or for City staff; and
- The experience of SDCI analysts in reviewing non-project actions.

ELEMENTS OF THE ENVIRONMENT

Adoption of the possible amendments would result in no immediate short-term adverse impacts because the adoption is a non-project action. The discussion below generally evaluates the potential for long-term adverse environmental impacts from net differences in future land use and development patterns that might occur as a consequence of the proposed amendments. Therefore, this programmatic analysis is meant to encompass direct, indirect, and cumulative impacts related to the proposal.

NATURAL ENVIRONMENT

Earth, Water, Air Quality, Plants & Animals, Environmental Health

Adverse impacts would not be probable for several elements of the proposal, given that they would lead to greater efficiencies of transportation or parking activities by encouraging more efficient provision and use of parking, setting maximum limits on flexible use parking, and supporting personal use of alternative transport modes such as bicycles and car share vehicles.

Indirectly, the range of actions anticipated in the proposal would generate only a minor possibility for non-significant adverse impacts in future development. To the extent that increased flexibility for long-term parking might generate more vehicle trips in various locations, a minor increment of additional air pollution and potential for pollutant wash-off in stormwater from roadways to stormwater runoff could occur. However, these types of adverse outcomes could be at least partially offset by other effects of the proposal because of greater encouraged transit ridership and probable levels of use of alternate transport modes that would affect total vehicle travel volumes. The minor magnitude of air, noise, and release of toxics to roadway runoff is inferred, based on the SEPA checklist preparer's experience, because:

- Even citywide air emission impacts of long-term growth are not anticipated to generate significant air quality impacts;
- The nature of ambient noise measurement techniques means that the added vehicle trips would likely affect future noise levels in any given location to only a minor-to-minimal degree of magnitude; and
- Increments of added toxics in run-off from modest increases in local traffic would likely be indistinguishable from the toxics added by the no-action condition (not adopting the possible amendments).

The potential range of impacts on environmental health and plants and animals would relate primarily to the same phenomena of air and water pollution discussed in this section, along with potential impacts related to additional noise to the extent that such pollution could add adversely to degradation of natural environments for plants and animals. No significant adverse impacts are identified with respect to the earth element of the environment.

Additional impact discussion about individual elements of the proposal:

A. Flexible-Use Parking: The ability to more flexibly park in local garages for long-term periods (e.g., more than 4 hours) could attract more automobile traffic to given areas for local shopping/ entertainment purposes or conceivably by employee commuters. On the one hand, these factors could contribute to incremental increases in air and water pollutant emissions. On the other hand, this recommendation could also contribute to long-term reductions in traffic volumes, because parking-search related traffic could reduce over time for those persons newly parking off-street. This could include area residents, for which the proposal would better enable sharing of residential parking. Research shows that parking-search traffic can be a substantive portion of area traffic volumes.[2] Also, to the extent the parking resources used would either be in existing buildings or in newly-permitted buildings, the parking will, in most situations, have been subject to prior review that has already accounted for their potential parking-related natural environmental impacts.

[2] Barter, Paul. "Is 30% of traffic actually searching for parking?" October 2013 Blog post at Reinventingparking.org.

B. Parking Maximums: Setting parking maximums for flexible use parking would rein in the highest amounts of parking that could otherwise be provided in future development. This type of action would likely help limit the overall worst-case potential for increased stormwater and air pollution over time caused by parking-related vehicle traffic that is relevant to the proposal.

C. Institutional Parking Flexibility (non-Major): If less parking is provided overall, parking and traffic activity could be reduced incrementally, although some traffic demand would still be generated by institutional uses. The potential right-sizing of parking would also help building design efficiency and embodied energy associated with construction. These factors would help to avoid or reduce an increment of future potential water or air pollutant contributions.

D. Delete Northgate Parking Rules: There would be minimal potential for significant adverse differences in air, water, and environmental health impacts. It is possible that fewer parking spaces overall could be built in Northgate with these changes, which might contribute to positive natural environmental impacts by helping avoid greater levels of impervious surfaces and traffic and associated stormwater wash-off of pollutants into local water bodies.

E. Expanded Off-Site Parking Distance: The proposed enabling of more off-site parking sharing would not be likely to generate measurable differences in pollutant discharges to air or water, or adverse effects on noise or toxic substance release.

F. Amend and Clarify Frequent Transit Service Measures: For several of the bus routes evaluated by Summer 2016 service levels, the comparison of today's frequency standards versus proposed standards leads to similar results: frequency standards are met according to either measure. For these kinds of locations there is no potential impact difference at all in using the existing standard versus the recommended standard. The only net difference in adverse impact potential is where the bus service frequency does not meet today's standards but would meet the proposed standards. According to SDCI analysis, the places where this could occur are described in the discussion of Transportation and Parking impacts later in this determination. They include portions of transit corridors in each quadrant of the city, including places like the Central District, Lake City, Stone Way N, Roosevelt Way NE, 35th Avenue NE in northeast Seattle, 35th Avenue SW in West Seattle, and Nickerson Street in north Queen Anne. See a more specific listing of these places in the Transportation, Parking impact discussion later in this determination.

The degree of potential impacts on air and water resources arising due to potential differences in development (comparing scenarios where parking is potentially required vs. not required) in this narrowed area is not expected to be significant. With or without parking provided on-site, applicable development requirements would lead to providing stormwater/drainage systems water quantity and water quality protective systems, limiting the potential for adverse impacts to occur. Potential differences in air quality pollutant outcomes might be positive to the extent that fewer automobiles might be present, or might be neutral if difference in automobile presence is minor.

G. Surface Parking for Carshare Vehicles: Allowing for up to three car share parking spaces in setbacks of future development would slightly increase likely impervious surface coverage and provide an outdoor parking use that would contribute to slight increases in potential pollutant discharges in stormwater and air pollutant discharges through normal use of the car share vehicles.

H. Minimum Parking Space Sizes: No adverse impact potential of this kind is identified for reinstating the code's minimum sizing of parking spaces provided, which were eliminated in 2012.

I. Update Bicycle Parking Requirements: No adverse impact potential of this kind is identified for updating minimum standards for providing bicycle parking. By providing for sufficient bicycle parking supply and ease of use, the likely net change in transportation choices toward slight reductions in per-capita motor vehicle use would lead to lowered potential for adverse impacts of this kind.

J. Allow park-and-ride facilities within garages as a permitted use: The potential types of adverse impacts would be non-significant and like those indicated for Item A above, due to a potential for relatively limited increases in traffic, air pollution, noise, and potential additions to pollutants in water runoff on arterial streets affected by park-and-ride traffic.

K. Clarify parking rules and reduce parking minimums for income-restricted housing: The potential types of adverse impacts would be non-significant and like those indicated for Item C above. With or without parking provided on-site, applicable development requirements would lead to providing stormwater/drainage systems, water quantity and water quality-protective systems, limiting the potential for adverse impacts to occur. Potential differences in air quality pollutant outcomes might be slightly positive to the extent that fewer automobiles might be present, or might be neutral if difference in automobile presence is minor.

L. Require pedestrian door and access route: There would be minimal potential for significant adverse differences in earth, air, water, and environmental health impacts as a result of the proposal. Requiring a pedestrian garage access door and route to a right-of-way in newly developed structures could lead to slight increases in impervious surface coverage if an additional hard-surface walkway is provided to reach a right-of-way. This could lead to slight increases in stormwater runoff and associated pollutant contributions to drainage systems or site soils.

M. Allow parking reductions to meet demands as shown by professional study: No adverse impact potential of this kind is identified for accommodating provision of less parking that is in line with projected parking demands. This would not be likely to create impacts to natural environmental elements related to automobile traffic. If anything, there could be potential for reduced discharge of pollutants to water and air,

and reduced noise potential if unneeded parking structures or lots do not need to be built, as an outcome of this proposed item.

N. Unbundling parking. As a strategy that would enable more individuals to make efficient choices about whether or not to lease parking spaces, and assuming that this leads to increased frequency of choices made to commute using transit or other non-single occupant automobile method or live without a vehicle (given cost savings that would be possible), the most likely impacts would be reduced incidence of per-capita impacts on these environmental elements. As such, no significant unavoidable adverse impacts to these elements of the environment are anticipated.

O. Changes to SEPA parking policy language. The proposal revises the description of policy background on this topic, refers to other existing City policy directions related to growth and transportation, and adds new types of parking mitigation strategies. This proposal has minimal potential to generate adverse physical impacts in the natural environment, directly or indirectly. To the extent that additional use of new parking-mitigation strategies occurs, increased use of vehicle-sharing and mobility-choice methods is anticipated to generate degrees of positive environmental impact through incrementally reduced air pollution potential and deposit of hazardous substances into the environment.

Energy

The proposal would result in no direct adverse impacts in terms of energy or natural resources depletion because it does not directly propose development. The proposal would encourage improved functioning of the city in terms of parking activities and parking resources, which would tend to avoid and reduce adverse impacts in relation to energy use and depletion of natural resources, and could result in positive environmental impacts. This would occur by:

- Enabling greater efficiencies in transportation, vehicle ownership, and parking choices;
- Allowing greater efficiency in the use of parking resources;
- Encouraging right-sizing of parking resources;
- Streamlining regulations to avoid conflicts and inefficiencies;
- Providing greater parking opportunities for alternate travel mode choices such as bicycles and car-share vehicles; and
- Helping building design efficiency and reducing embodied energy associated with construction, given expected efficiencies gained in designing garages and buildings without garages.
- Allowing for increased use of vehicle-sharing and mobility-choice methods as mitigation measures in future City decisions on development proposals through the proposed SEPA policy wording updates.

These kinds of changes and their implications for the environment would be to encourage more efficient usage of energy and natural resources, compared to a scenario where the recommended changes would not occur.

BUILT ENVIRONMENT

Relationship to Plans and Policies, Land Use, Housing, Noise, Height/Bulk/Scale, Historic Preservation and Cultural Resources

The potential indirect effects of the proposal on future development characteristics would not change the types of non-parking use dimensional height or maximum bulk capabilities that are allowed, and so they would not be anticipated to generate adverse height/bulk/scale impacts, shadow impacts on public spaces, light/glare, public view, or shoreline-use-specific impacts. Rather, the implications for building design relate primarily to substitution of housing into building areas that would have been occupied by parking ramp or garage space if built according to current regulations. No impacts are anticipated in relation to historic preservation and cultural resources, due to a lack of changes that would adversely impact such buildings or the review process for potential landmarks, or that might affect development patterns in places that might have unknown cultural resources. Thus, the discussion below is limited to focus on aspects of potential adverse land use impacts that may substantively relate to the proposal and its potential influences on future development patterns. The nature of the following impact analysis encompasses the cumulative impact potential that might occur, in relation to future development.

Land Use Patterns and Relationship to Plans and Policies

This proposal would reinforce and continue a number of current policies and codes that support efficient, low-parked development in areas well-served by frequent transit service; and would increase the ability for certain kinds of non-residential uses to develop with low-minimum amounts of parking (such as for several kinds of non-major institutional uses in frequent-transit-service areas). The proposal would amend codes in ways that encourage use of transportation modes other than low-occupancy automobiles, through actions supporting bicycle and car-share service use, and future land use and development patterns that would support transit ridership. At the same time, elements of the proposal would allow greater flexibility in use of parking in a variety of commercial and multifamily zones that would enable more flexible parking capabilities for all motorists, while also setting a new maximum limit on the amount of flexible-use parking that could be provided.

The overall effects of this combination of actions are likely to reinforce current land use and development trends where infill development with housing serving a range of households would likely continue to occur in patterns that would often tend to favor areas that are within Urban Centers, Station Area Overlays, and portions of Urban Villages well-served by transit. These trends are consistent with the intent of the City's Comprehensive Plan and Land Use Code regulations. These plans and policies include support for a substantial proportion of residential and non-residential growth to occur within the designated areas named above, to encourage denser, more active and more varied places with services and amenities that encourage pedestrian circulation, bicycle use, and transit ridership, rather than automobile trip-making. To the extent the proposal continues and reinforces patterns of growth resembling recent land use and development trends that are described above, it would be consistent and compatible with the intent of existing City land use policies. As well, such growth patterns would aid in avoiding increments of impact upon the region that could otherwise occur if future development were

instead distributed across more of the Puget Sound region, which would generate higher per-capita environmental impacts (generated by greater per-capita vehicle miles traveled) in relation to transportation, air quality, and to natural water and wildlife systems.

The City's SEPA policies state that mitigation for identified adverse parking impacts is not required in Urban Centers (except in one portion of the University District Urban Center), light rail station areas, and in Urban Village areas served by frequent transit service, and this proposal would not change that. The proposal updates policy background and references to land use and transportation policies, and adds the possibility of vehicle-sharing and mobility-choice methods as possible mitigation measures for development review decisions.

Several of the proposed changes pertain to use of parking in new or existing buildings. To the extent that greater use of existing parking resources or more efficient arrangements of parking occur, these outcomes would represent a positive land use impact. Also, greater parking efficiencies would help avoid excess parking provision (represented, for example, by typical nighttime parking occupancy levels that fall below 70% in surveyed multifamily buildings) that would consume space that could otherwise be used more effectively for both non-residential and residential uses. Increasing the land use efficiency of properties in the ability to accommodate these non-parking uses is also a positive land use impact, because the greater presence of a mix of residential and commercial uses, and the residents and business patrons they bring, contribute to the enhanced activation and vibrancy of neighborhoods while supporting city-wide and urban village growth patterns that are preferred by the City's Comprehensive Plan. SDCI-based data that generally support that parking is being efficiently provided in recent development include:

- Development data from the last four-plus years through late 2016 (including those in permitting, under construction, and recently completed) that suggests parking supply in the affected area is being "right-sized" in new developments, so that while a number of housing developments are built or will be built with no parking, an even larger proportion of housing developments do or are expected to contain parking. The data also show that the parking in the developments is being provided in amounts that are likely able to satisfy expected levels of parking demand (for development proposals that include parking, the average amount to be provided is 0.73 spaces per dwelling unit). And, the data indicate that 87% of dwelling units in this data record are occurring or are expected to occur in developments that include parking.

Housing

Whether viewed from a city-wide perspective or neighborhood-by-neighborhood perspective, the proposed amendments' enabling continued efficiency and capability to construct affordable housing is a positive impact pertaining to the Land Use–Housing element of the environment. This relates primarily to proposal Item F (Amend and clarify frequent transit service measures) but also Item E (Expanded off-site parking distance) and Item K (parking efficiencies for income-restricted housing) discussed further below. It is logical to conclude that by not saddling developments with costly minimum parking requirements, costs to provide new housing would continue to be as efficient as they are under current policies and regulations in frequent transit service areas. Costs to develop a building are factored into the ultimate cost of housing. To cite one source, a 2012 City of

Portland study[3] quantified how much the costs of different forms of parking in typical developments would add to the cost of rent if parking costs were fully recouped by rents. The study found that requiring underground garage parking at an estimated cost of up to $55,000 per parking space on a 10,000-square-foot lot would add approximately $500 to the cost of monthly rent per dwelling unit. This 2012 study also quantified the tradeoffs in building designs' use of space for parking or residential living space. It found that avoiding providing an underground parking garage would allow a building with no parking to gain up to 6 dwelling units more than the 44 units possible with a garage on a typical 10,000 square foot lot.[4] This represents primarily the substitution of more residential units into the building area where garage access ramps to underground parking would otherwise be built.

The positive land use and housing impacts of the City's proposal identified above are tempered though, because in many places the proposal would merely continue the existing ability to propose development with no minimum parking, meaning no net change in conditions. Only in a certain range of areas, described in the Transportation and Parking discussion later in this determination, would the proposed changes newly allow development without minimum parking or with parking at half the otherwise-required minimum levels.

Land Use Patterns and Compatibility

The discussion earlier in this determination indicates that the proposal would not likely generate significant adverse height/bulk/scale impacts, and that it would support many of the City's planning and policy objectives for the location of future growth in areas near frequently-served transit routes. The following discussion focuses on whether the proposal's physical implications for future development are likely to generate an added potential for adverse land use compatibility impacts on neighboring uses or vicinities with future development. This would pertain only to areas where the proposal would newly allow development without parking or less than the otherwise-required minimum levels. Based on SDCI analysis, these locations are summarized in the Transportation, Parking discussion later in this determination, under Item F. In areas where no-minimum parking is already possible and would continue, the proposal would not alter development capabilities and would generate no added potential for land use compatibility impacts.

In the newly-affected areas, the proposal would enable infill development without any parking or with a 50% reduction in parking from the otherwise-applicable requirement. In any given development, an added potential for residential development would be possible, in an estimated probable range of up to 6-12 dwelling units per development that would omit parking.[5] The added density would add to overall residential activity levels and related effects like potentially increased noise. This is evaluated as an adverse land use impact, but one of relatively minor (less than significant) magnitude given: the already-urbanized existing physical context of Seattle's Urban

[3] https://www.portlandoregon.gov/bps/article/420062. The study assumed a 550-square foot typical dwelling unit size, and a 10,000 square foot typical development site size.
[4] IBID.
[5] This estimate follows from Portland's study referenced above, but with an upward adjustment to reflect a smaller minimum unit size in Seattle and a "worst-case" assumption regarding how many additional dwelling units could fit into building area where parking access ramps would no longer be required. (Clowers, SDCI, 2016).

Village environments, in places like the Central District, Othello, Roosevelt, Wallingford, and Upper Queen Anne Urban Village; the nature of how additive noise is measured; and the relative uncertainty about whether or how often future development with zero parking would occur in any given vicinity.

Despite this potential for relatively minor adverse impacts on a site-by-site basis, the most likely future condition and experience of future development should be characterized on a broader neighborhood vicinity and city-wide basis. Upon closer examination using a SEPA built-environment impact perspective, the newly-affected areas are interpreted in this SEPA determination to have characteristics that limit the overall potential for development compatibility impacts in any given affected area, at least for the increment of added development that would be possible with this proposal. The affected areas are along a variety of arterial corridors, most with modest scales of zoning. Several of these corridors, or portions of them, have a relatively limited presence of zoning for dense development, and a limited presence of surrounding zones suitable for widespread multi-block patterns of development intensification in forms that might provide no parking. This analysis also recognizes that townhouse-style development where it is present in certain affected areas often provides on-site parking in garages. Another separate observation about land use development trends is that in some areas there is not a substantial pressure for residential/mixed-use infill redevelopment due to their geographic locations in lower-density areas of the city that have long-established land use patterns with a range of non-residential service uses (like Wedgwood) or general commercial uses (along parts of Lake City Way) that already define their primary role as local neighborhood commercial districts or automobile-oriented commercial districts. Conversely, in other areas like lower Stone Way or the Squire Park portion of the Central District, there is already considerable infill development occurring even though these areas largely are subject to minimum parking requirements.

In all of these places, the prevailing land use conditions suggest two possible kinds of land use patterns and trends: (1) Where infill development is already densifying land use patterns even without parking code flexibility, with a large proportion of properties already substantially developed and not likely to extensively redevelop with reduced parking; or (2) Where residential redevelopment pressures are relatively low, with an implication that new residentially-denser future development would likely occur at a slow rate and be present mostly in spot or intermittent locations likely to be distant from one another, suggesting a low probability for adverse land use compatibility impacts of increased residential presence accumulating in any given area. Examples of this include the 35th Ave NE corridor in NE Seattle, and the 35th Ave SW corridor in West Seattle where instances of denser-zoned properties are scattered only intermittently along the corridor and that typically contain a mix of small stores, service uses and restaurants that are among the only local commercial services conveniently available to their neighborhoods. In these areas, it does not appear probable that a trend of concentrated mixed-use redevelopment would emerge based merely on an ability to substitute residential uses into space no longer needed to meet parking requirements. It should also be noted that both of the aforementioned vicinities (35th Avenue NE and 35th Avenue SW) are located largely outside Urban Villages and would be eligible only for a maximum 50% reduction in required parking. Places such as the Nickerson Street corridor, and newly affected spot vicinities on Wallingford Ave N between N 35th and N 40th Streets and along N/NE 40th Street in Wallingford (due to the 31 and 32 bus route combination)

generally fit a profile with impacts as described in (2) above, due to their existing development pattern with varying mixes of relatively low-density general commercial uses and established multifamily housing structures. These places also would be eligible only for a maximum 50% reduction in required parking.

Discussion of the potential for adverse land use impacts in relation to future development, for individual parts of the proposal, is provided as follows:

A. Flexible-Use Parking: As noted above, the proposed ability to more flexibly use parking would provide opportunities to increase overall land use efficiencies in terms of how effectively off-street parking resources are used. By increasing parking activities at garages that would implement changes in practices, general activity levels at some buildings could increase, including more vehicles and people walking in and out of buildings. In the worst case, the activity could contribute to increased frequency of noisy conditions, and other similar effects. While these kinds of secondary effects would not be considered to generate significant adverse levels of land use incompatibility (due to their probable minor degree and an uncertainty as to how often they would occur), they are concluded to be a nonsignificant adverse land use-related impact. Noise regulations would continue to apply within the city, in ways that would provide for reasonable protections to address noise impacts if they occur.

B. Parking Maximums: From a land use impact perspective, defining a new maximum parking limit on flexible-use parking and eliminating a special exception allowing more-than-maximum-limits parking amounts in Downtown would not generate adverse land use impacts. Instead, these actions would help to avoid potential worst-case outcomes relating to over-provision of parking in ways that would conflict with City policy intents. Also see the Transportation and Parking section of this analysis for more discussion.

C. Institutional Parking Flexibility (non-Major): Allowing for flexibility in providing parking for institutional uses, except hospitals, and institutes for advanced study in single-family zones, could help improve overall efficiencies of land use patterns, and could enable providing the uses in cases where the on-site parking requirements might otherwise prevent or discourage them. Examples of this include a specialty neighborhood-related museum that would be primarily oriented to pedestrian traffic, or a child-care use that might be able to fit within a small property in a mixed-use neighborhood center district if not for the parking required. The proposal would enable this to occur where frequent transit service is available within 1,320 feet (1/4 mile). Essentially, this change would eliminate a regulatory disadvantage for institutional uses when compared to commercial and residential uses in the same Urban Village areas that have no minimum parking requirement. The potential for adverse land use impacts relates to increased activity levels and noise that might occur if low-parked institutional uses that are enabled generate additional traffic circulation and potential for cars parking in nearby streets. While adverse, these impacts are not likely to be significant adverse land use impacts because the most probable outcomes for these kinds of uses is likely to be providing parking on site or arranged in off-site locations that would be tailored in amounts to approximately meet anticipated needs of the institutions' users. Also, because the proposal enables more flexible use of "flexible-use parking" there would be an increased ability for the uses to arrange to use available underused

off-street parking in other buildings. Both factors would contribute to mitigating the potential for adverse increases in activity levels.

D. Update Northgate Parking Rules: The proposal would substitute other parking controls, including a flexible-use parking limit, in place of Northgate's current rules, established in the mid-1990s, a change for which there would be minimal potential for adverse differences in land use-related impacts.

It is possible under the proposal that fewer parking spaces overall could be built in Northgate's future development. The existing Northgate overlay district code provisions are complicated by factors that allow a number of reduction and expansion opportunities in parking amounts, and similar push/pull effects on the physical form of parking facilities. If the code requirements are removed, future development applicants and designers would be more clearly able to determine how much or little parking is needed to serve future uses and how it can be best arranged. Aesthetic treatment and pedestrian circulation requirements for parking lots would be retained.

E. Expanded Off-Site Parking Distance: Encouraging more flexibility in the shared use of parking through off-site parking strategies, as an efficiency-related strategy, would not be likely to generate adverse land use impacts. Moreover, this could enable a wider range of opportunities for future uses to take advantage of available existing off-street parking supplies and share them, which would tend to increase land use efficiencies. A similar finding is that increasing capabilities for off-street parking could allow for slightly reduced pressure in the demand for on-street parking resources, and thus a potential increase in the availability and usefulness of on-street parking for a greater range of people.

F. Amend and Clarify Frequent Transit Service Measures: Meeting the new frequency standard in the identified geographic areas would enable future development to be provided with no parking, or a flexible amount of parking that is less than the otherwise required minimum level of one space per dwelling or the applicable non-residential parking requirements. In these areas, a probable outcome is the future development of a mix of buildings that could include development with a greater density of residential dwelling units. According to the Portland study's findings and SDCI analysis, the estimated additional residential density probable for any given development is in a range of up to approximately 6-12 dwelling units. Refer to discussion of potential adverse land use compatibility impacts on pages 11-14 of this determination.

G. Surface Parking for Carshare Vehicles: Accommodating carshare parking for up to three vehicles in front or side setbacks in commercial or selected multifamily zones would represent a change from the typical City regulatory approach that seeks to reduce the aesthetic detriments that can be caused by vehicles parking between a building and street property line. Accordingly, this sort of change is concluded to generate an adverse land use impact but not a significant adverse impact. This effect could be avoided or reduced depending on how discreetly the parking can be incorporated into site plans. The parking could be well designed for many lots (tucked to the side or mitigated by landscape treatments at their edges for example), but the degree of screening or aesthetic treatment would depend on the physical details of each property and development.

H. Minimum Parking Space Sizes: No adverse land use impact potential is identified for reinstating the code's minimum sizing of parking spaces provided, which were eliminated in 2012. Rather, it would address a pragmatic functional purpose by setting a minimum standard for residential and live-work uses' parking space sizing in lots and garages.

I. Update Bicycle Parking Requirements: No adverse land use impact potential is identified for updating minimum standards for providing bicycle parking. By providing for sufficient bicycle parking supply and ease of use, there would be a greater need for building owners and designers to give appropriate spaces indoors or outdoors for bicycle parking facilities. The proposed changes would increase the amount of bicycle parking, most notably in the Downtown Urban Center. Despite the potential for these changes to be a complicating factor in building and site design, this would not represent an adverse land use impact because it would not cause a substantive detrimental effect on land use patterns in general or in the ability to effectively develop any given property.

J. Allow park-and-ride facilities within garages as a permitted use: This proposal would accommodate potential increases in activity levels, to the extent that potentially underused parking spaces would likely be more efficiently used by offering them as park-and-ride facilities that are anticipated to be paid parking. To the extent the parking resources used would either be in existing buildings or in newly-permitted buildings, the parking will, in most situations, have been subject to prior review that has already accounted for their potential parking-related impacts. Also, the effect of the use would be experienced as vehicles entering and leaving the garage in the same manner as other garage-oriented vehicle activity, during morning and early evening hours, without a substantive adverse difference in manner of use than already permitted for a garage. Therefore, no significant adverse impacts relating to land use or compatibility are identified.

K. Clarify parking rules and reduce parking minimums for income-restricted housing: This proposal would represent a tangible step in support of accommodating and encouraging affordable housing for income-restricted households and the disabled in a more efficient manner that likely would accomplish slight increases in amount of residential density possible on each site in a future development. These would be positive types of land use impact in terms of housing. Like the discussion under Item C above, the potential for adverse land use impacts relates to increased activity levels and noise that might occur if low-parked affordable housing uses that are enabled would generate additional traffic circulation and potential for cars parking in nearby streets. While adverse, these impacts are not likely to be significant adverse land use impacts because the most probable outcomes are likely to be providing parking on site or arranged in off-site locations in amounts that would meet most if not all the anticipated needs of the housing users. It should be noted that income-restricted housing tends to generate lower per-capita vehicle trip generation due to lower vehicle ownership rates of typical resident populations.

L. Require pedestrian door and access route: A new pedestrian door and route, applicable to new development, would accommodate public users of parking in new development, which could

generate additional adverse incidents of noise due to people using that route. However, even without a required door, the same future users of a garage could make use of other building exits through driveways and garage doors, emergency exit doors, or lobby doors, and could create similar noisy activity.

M. Allow parking reductions to meet demands as shown by a professionally-prepared study: No adverse impact potential is identified from this proposed item, because accommodating a reduced parking amount that matches projected parking demands would not be likely to create differential adverse impacts. In other words, the future outcomes affected by this item would not generate significant potential for land use incompatibilities or adverse differences in activity levels at any given location.

N. Unbundling parking: While unbundling of parking space rentals from multifamily rental agreements already occurs in many cases, the requirement for the practices would enable greater efficiencies in choices made by individuals to live without owning an automobile in a given location. To the extent this occurs, it could allow future residential development to be built with lesser amounts of parking, to generate less overall traffic volumes from its site, and possibly result in a greater efficiency in amount of housing provided per unit of land. Such effects would tend to generate positive land use and compatibility impacts within affected neighborhoods. Similarly, giving the option for commercial tenants to lease less parking could lead to more efficient transportation choices made by employers, employees and others, and could lead to more parking spaces available for flexible parking uses. No significant adverse land use or compatibility impacts are identified because of this proposal.

O. Changes to SEPA parking policy. The proposal updates policy discussions by referring to other existing City policy directions related to growth and transportation that are drawn from the current City Comprehensive Plan *Seattle 2035*, and adds new types of parking mitigation strategies. The parking policy would continue to support the existing policy that does not provide SEPA authority for parking impact mitigation (other than for cumulative impact mitigation) in certain portions of the city, including Urban Centers (except in one portion of the University District Urban Center), the Station Area Overlay District, and in Urban Village areas that are within 1,320 feet (1/4 mile) of frequent transit service stops. At the same time, the proposal retains the existing orientation of the SEPA policy that allows for cumulative impact mitigation and for the possibility of parking impact mitigation for proposals in other portions of the city. Thus, the proposed changes to this policy wording would not be expected to generate built environmental impacts, directly or indirectly, due to only a minimal level of revision in the meaning of the policies. This includes in relation to land use, housing, height/bulk/scale, noise, historic/cultural preservation, and relationship to plans and policies. To the extent that additional use of new parking-mitigation strategies occurs, increased use of vehicle-sharing and mobility-choice methods would be anticipated to generate degrees of positive environmental impact by accommodating methods of transportation that would have parking impact-mitigating value through possible permit conditioning of future development proposals.

Transportation, Parking

Indirectly, the proposal would contribute to a range of effects on future characteristics of development, some of which could induce increased local traffic to and from more conveniently usable off-street parking, and some of which could induce lesser amounts of local traffic by reducing parking-search-related traffic in neighborhoods if people would more frequently park off-street rather than on-street, and if people more frequently use transportation modes other than automobiles. The range of effects could also include the potential for added levels of spillover parking demand for on-street parking supply in places near future development, if future development provides parking in amounts lesser than the actual demand created.

The proposal would enable more efficient transportation choices to be made by more people, and a "right-sizing" of parking supplies, meaning supplies that would be provided in amounts more closely matching projected actual needs in future development. This includes continuing and reinforcing the current City policies that enable less parking in places where residents can conveniently access frequent transit service. In places where there are more choices between housing with or without parking, more residents would likely more often make "self-selecting" judgments in housing choice. In other words, those that do not own a car would choose more often to live in residential units without dedicated parking ("bundled" into their rental agreement or lease) if they do not need it, and those with cars would choose more often housing with parking if they need or prefer to have parking. Research has found that people living in transit-oriented developments and in proximity to frequently-served transit own fewer than the average number of vehicles, drive less, and rely more on transit.[6] Similarly, research suggests that the availability of transit choices is a factor that leads some households to make self-selecting judgments in choice of residence locations that have more transportation options, which helps explain the higher transportation efficiencies in transit-oriented "smart growth" vicinities.[7]

Research on land use and parking policy has found that policy approaches condoning and requiring larger amounts of parking tend to create conditions that perpetuate and grow traffic congestion by encouraging low-occupancy automobile travel.[8] In contrast, policies with greater constraints on parking help to moderate impacts on cities and their transportation systems by supporting transit travel modes and improving traffic congestion, and thus contributing toward overall system efficiencies.[9] Transit accessibility is one of the most important factors in predicting actual demand for residential parking (e.g., lower parking demand in places with

[6] Litman, Todd and Rowan Steele. "Land Use Impacts on Transport. How Land Use Factors Affect Travel Behavior." 2009, and 2016. Victoria Transport Policy Institute. Litman and Steele cite to several other studies on this finding: Cervero, et al. 2004; CNT 2010; Evans and Pratt 2007; Gallivan, et al. 2015; Gard 2007; Portland 2009; Pushkarev and Zupan 1977; Suzuki, Cervero and Iuchi 2013; Tal, Handy and Boarnet 2010; TransForm 2014.
[7] University of California – Davis Institute of Transportation Studies. "California Smart-Growth Trip Generation Rates Study Appendix B – Annotated Literature Review of Land Use-Transportation Relationships." 2010, 2011.
[8] Shoup, Donald. "The trouble with minimum parking requirements." 1999. University of California – Los Angeles.
[9] Zhang, M., Mulholland, Zhang, and Gomez-Sanchez. "Getting the Parking Right for Transit-Oriented Development" 2012. Center for Transportation Research, University of Texas at Austin; Center for Neighborhood Technology, "Right Size Parking Project, Literature Review – Statistical Methods" 2011.

greater proximity to and concentration of transit service), with a high statistical correlation.[10] Therefore, by reinforcing current policies on parking and frequent transit service, the proposal would be likely to support overall efficiencies of transportation patterns along with land use patterns in ways that would be beneficial to the city and the region as a whole. This is accomplished through encouraging well-located future development that supports household living choices and transportation choices that are more compact, well-served by transit, and with more affordable housing options.[11] The patterns also contribute to better environmental impact outcomes by avoiding the alternate outcome of higher-growth patterns distributed in more far-flung areas of the city and region, which would require higher vehicle-miles-traveled (VMT) per capita,[12] would more heavily stress regional transportation systems, and would likely generate a greater impact on earth, water, and air quality.

City of Seattle development data from the last four-plus years through late 2016, including those in permitting, under construction, and recently completed, that are a result of current parking policies, shows that parking supply is being "right-sized" in new developments that encompass approximately 50,000 dwelling units built or likely to be built in the future. While a number of housing developments will not have parking, an even larger proportion of housing developments do or will contain parking.

The data show that the parking in most developments is being provided in amounts that are likely able to satisfy expected levels of parking demand. In development proposals that include parking, the average amount to be provided is 0.73 spaces per dwelling unit. And SDCI analysis of the data indicates that 87% of dwelling units in this data set are occurring or will occur in developments that include parking. This level of parking provision compares well to anticipated parking demand levels, for which the City's reviews typically assume to be approximately 0.5-1.0 cars per dwelling unit,[13] or lower for smaller-unit multifamily development types. Multiple professional transportation studies for individual developments in Seattle have found that parking demand may range as low as 0.3-0.35 spaces per dwelling unit in smaller-sized housing serving these households, in areas well-served by transit.[14] Future project development parking performance from the last four-plus years can reasonably be forecast to continue if City policies continue to allow no minimum parking in proximity to frequent transit. See additional discussion under Item F later in this section. It should also be noted that comparable levels in providing residential parking were also observed in Portland, Oregon along frequent-served transit corridors when there was no minimum parking requirement.[15]

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[10] D. Rowe, Morse, Ratchford, Haas, Becker. "Modeling of Multifamily Residential Parking Use in King County, Washington." Transportation Research Record 2469. 2014.
[11] Litman, Todd and Rowan Steele. "Land Use Impacts on Transport. How Land Use Factors Affect Travel Behavior." 2009, and 2016. Victoria Transport Policy Institute.
[12] IBID
[13] John Shaw, SDCI, 2016.
[14] William Popp Associates. "Parking Demand Study, and Parking Utilization Study" for Pholston Paradise Apartments, 6917 California Ave. SW, Multi-Family Residential Development, [MUP] Project #3016077. January 2014; The Transpo Group. Parking Memo – 1510 NW 52nd Street. [MUP] Project #3015204. March 2013.
[15] Joe Recker. "Parking at Transit-Oriented Multi-Family Residential Developments: Measuring parking utilization at residential TOD sites in Portland, OR." Portland State University. September 2007.

SDCI analysis of data on vehicles available by housing tenure (owner- or renter-occupied) from the American Community Survey for the 2010-2014 period shows the tracts with the highest proportions of renter-occupied housing also have the greatest presence of renter households that do not own automobiles. For the one-quarter of census tracts with the highest proportion (80%) of renter households, 40% of all renter households indicate no vehicle was available to them. In the smaller subset of the one-eighth of census tracts with the highest proportion (87%) of renter households, 48% of all renter households do not own an automobile. This compares to an average condition of 21% of renter households with no vehicle available in Seattle census tracts, and 9% of renter households in the one-quarter of census tracts with the lowest shares of renter-occupied housing. Also, the average condition for owner-occupied housing in Seattle census tracts is that only 6% of homeowner households have no vehicle available to them.[16]

Elements of the proposal would generate adverse impacts by increasing demands for on-street parking, to the extent that future developments providing little or no parking, in places where that is newly possible, would contribute to additional residents with vehicles that would be seeking to use on-street parking. See the discussion under Item F below. Also included under Item F is a discussion of other cumulative impacts that could occur due to effects of the proposal along with other known upcoming parking-related City program changes, which consist of possible changes to the Restricted Parking Zone (RPZ) program, and contributions to transit vehicle occupancy levels.

Discussion of the potential for adverse transportation and parking impacts in relation to future development, for individual parts of the proposal, is as follows:

A. Flexible-Use Parking: The proposed ability to more flexibly park in local garages for long-term periods (e.g., more than four hours) could attract more automobile traffic to given areas for local shopping/entertainment purposes or perhaps due to increased employee commuting traffic (in places without other protective regulations in the Land Use Code). Parking recommendations could also contribute to long-term traffic reductions if parking-search related traffic volumes diminish over time for those persons that would newly decide to park off-street regularly instead of searching for on-street parking. This could include area residents, for which the proposal would better enable sharing of residential parking resources such as between residents of different buildings.

   Overall, the net amount of potential increase in parking-related traffic, if there is a net increase at all, is not likely to be substantial enough to generate significant adverse traffic impacts on any given area. It is possible that if new off-street parking opportunities are opened up in somewhat lower-intensity zones like Lowrise 3, increases in traffic volumes to and from parking might be noticeable on local streets. This is identified as a potential adverse transportation impact but is not concluded to be a significant adverse impact due to its limited magnitude that is described in this paragraph and the preceding paragraph. One example of a Lowrise 3 zoned district is Capitol Hill east of Broadway and north of Denny Way, an area that contains a moderate-density mix of residential buildings in varying forms and local streets that are already subject to

[16] SDCI, 2016-2017.

traffic volumes by area residents and other pass-through traffic.

B. Parking Maximums: Setting a parking maximum limit for flexible-use parking and removing special parking exceptions in Downtown would define upper limits for residential-oriented parking uses and would constrain exceptions for non-residential parking uses that could be provided in future development. (In Downtown west of Interstate 5, there is already a 1 space per 1,000 square foot limit for non-residential uses.) Because it is an action that provides for reasonable restraints on maximum parking supply, this proposal is not likely to generate potential significant adverse transportation or parking impacts. The proposal includes a defined maximum limit on flexible-use parking that should allow for sufficient parking supplies that are accessory or flexible-use in nature. One overall purpose for this proposed maximum parking limit is to avoid outcomes where some building owners might supply excessively large amounts of additional parking that could be used for entrepreneurial flexible-use parking purposes. In the worst case without maximums, the ability to oversupply flexible-use parking could work against City regulatory intents. Thus, this proposal item would likely assist in preventing worst-case outcomes, would likely help limit contributions to automobile congestion levels, and would likely help maintain the operating efficiency of the city's street systems.

C. Institutional Parking Flexibility (non-Major): Allowing for flexibility in providing parking for institutional uses (except hospitals, and institutes for advanced study in single family zones) could lead to lesser amounts of parking provided overall, which could help to avoid inducing an increment of parking and traffic activity. However, many future institutional developments would still be expected to generate a degree of vehicle traffic regardless of parking availability (varying according to type of institution and its type of customers). To the extent future institutional uses might provide less parking such that they would not fully meet their parking demands, the uses would contribute incrementally to overall demand for other existing on- and off-street parking. This would represent a potential adverse transportation impact, but is not expected to be a significant adverse impact because the most probable outcomes would be to arrange for parking availability on site or in off-site locations to approximately meet the baseline parking needs of the institutions' users. This is inferred as a typical practice of institutional uses' representatives that gauge actual needs during their facility planning processes and seek ways to satisfy needs. These practices might lead to off-site parking arrangements if development sites are constrained in size. Also, because the proposal enables more flexible use of "flexible-use parking" there would be a probable increased ability for these uses to make parking arrangements in underused off-street parking in other buildings. All of these factors would contribute to mitigating the potential for significant adverse increases in traffic and parking impacts on surrounding areas.

D. Update Northgate Parking Rules: Despite deleting most of the Northgate-specific parking rules, likely outcomes in future levels of parking provision in Northgate would remain approximately like development under the existing code. One reason for this conclusion is that City data for non-residential developments in Northgate do not demonstrate that low parking rates are being pursued by any given type of residential or non-residential development. Incremental differences, if there are any, in future parking supply and demand outcomes are unlikely to generate significant adverse transportation impacts. Other applicable City parking regulations

would support flexibility and efficiency in providing parking (in amounts and types of parking), which might lead to fewer parking spaces per square foot being newly built in Northgate over time with these changes. When combined with the proposed maximum limit on flexible-use parking, the probable effect would be a continuation of effectively controlled parking supplies in Northgate while achieving greater clarity in City codes.

E. Expanded Off-Site Parking Distance: Encouraging more flexibility in the shared use of parking through off-site parking strategies would not be likely to generate significant adverse differences in transportation or parking impacts. Rather, it would encourage more efficient use of parking resources that would be a positive land use and transportation impact in neighborhoods where it occurred. Potential outcomes of increased frequency of sharing parking would not be artificially constrained by the current distance limit, but instead would be fully enabled within the distances that people are willing to normally walk, according to urban design and transportation planning principles.[17] The effect would be comparable to the intent of the City's existing regulations that encourage shared parking usage. It could, for example, lead to accomplishing greater rates of off-street parking, which would incrementally reduce pressures and demands for using on-street parking.

F. Amend and Clarify Frequent Transit Service Measures: SDCI's findings, including those evaluated and discussed earlier in this determination, lead to a conclusion that adverse transportation and parking impacts of this proposal would only be identified where there are potential future development outcomes that are incrementally different, for example, only where the bus route frequency does not meet today's standards but would meet the proposed standards. This would occur at redevelopable lots in multifamily or commercial-zoned areas within one-quarter mile walking distance of bus stops on the affected routes. For Urban Village areas, these include:
    a. 3 and 4 bus routes, Central District, portions of 6-12 individual blocks south of E Alder Street between 14th and 20th Avenues;
    b. 8 bus route, Central District – 23rd and Union-Jackson Urban Village along MLK Jr. Way S between E Union Street and Rainier Ave S;
    c. 67 bus route, Roosevelt Way NE and 11th Ave NE through the Roosevelt Urban Village;
    d. 75 bus route, the southeast edge of the Lake City Urban Village north of NE 120th Street;
    e. 62 bus route, portions of Green Lake, Wallingford, and Fremont Urban Villages: Green Lake Way N (west of Latona Ave. N), and Stone Way N between approximately N 35th and N 42nd Streets; and
    f. 3 and 4 bus routes, Upper Queen Anne Urban Village, in the northern portion of the urban village near Queen Anne Avenue/Boston Street.

    Affected areas also include a number of places outside Urban Villages, where newly meeting the proposed frequency measure would allow for a 50% reduction in the otherwise applicable minimum parking level. These include multifamily and non-residential zoned areas in the following locations:

[17] Fairfax County Planning Commission TOD Committee. "Walking Distance Research" abstract with numerous study citations and government guideline references citing typical walking distance tolerances. Fairfax County, Virginia; undated.

a. 21 bus route, West Seattle, portions of land along 35th Avenue SW between approximately SW Edmunds Street and SW Kenyon Street;
b. Central District, portions of land near the 2 bus route (Madrona vicinity), 3 and 4 bus route (between Cherry and Jefferson west of 19th Avenue), 8 bus route (MLK Jr. Way), and the 11 bus route (east of 28th Ave E to Lk. Washington Blvd.);
c. In north Capitol Hill, near the 49 bus route;
d. 75 bus route, Lake City Way north of Northgate Way, and portions of land along Sand Point Way between University Village and Lake City;
e. Portions of land in northeast Seattle near the 41 bus route (NE 125th St.), the 65 bus route (35th Avenue NE), the 62 bus route (along NE 65th Street), and 67 bus route (Roosevelt Way in Maple Leaf); and
f. 31 and 32 bus routes where combined. North Queen Anne (Nickerson Street) and Wallingford (Wallingford Ave N between N 35th and N 40th Streets, intersection of N 40th Street/Wallingford Ave N, and south of NE 40th Street and east of 1st Ave NE to Interstate 5).

The probable degree of adverse impacts to on-street parking in terms of probable added parking demand pressures, arising due to potential differences in development (comparing scenarios with parking required versus not required) in the narrowed area described above likely would not be significant. This conclusion is reached given the rationales and findings cited in other portions of this determination, the associated SEPA checklist, and the Director's Report for this proposal. This includes findings drawn from reviewing parking facts indicated in development permitting data from the past four-plus years from places where residential development is possible with no parking. Relevant findings include: (1) while a number of housing developments would not have parking, an even larger proportion of recent housing developments do or will contain parking; (2) parking in the developments is being provided in amounts likely able to satisfy expected parking demand levels (the average amount provided in developments with parking is 0.73 spaces per dwelling); (3) approximately 87% of dwelling units in the reviewed data record (in places where zero minimum parking is possible) are occurring or will occur in developments that include parking; (4) other points made earlier in this determination about the likely future parking demand and impacts of future development; and (5) points made in the rest of the analysis below.

The evaluation made in this determination cumulatively suggests that only a limited fraction of future development would generate parking demands that exceed off-street parking provided, and only a limited fraction of development would occur with no parking at all. Both could add to off-site spillover parking demands, but at levels well below 1 parking space per dwelling unit. For example, if a development proposal generated a projected demand for approximately 0.5 parking spaces per unit and the development proposes 0.3 parking spaces per unit, the incremental addition to parking demand would be evaluated as 0.2 parking spaces per unit. If the development proposal provides 0.5 parking spaces per unit, this analysis predicts there would be no incremental addition to on-street parking demands from the development. Because the affected areas listed above that are outside Urban Villages could only lead to a 50% reduction in required parking to levels at or near 0.5 parking space per unit, the potential for adverse parking impacts from residential development is minimized or eliminated, by definition. Strategies included in this proposal, including greater use of flexible-use parking and shared

parking opportunities, would also help to prevent or alleviate potential parking spillover impacts in all the affected areas.

To characterize a worst-case finding for potential additions to on-street parking demand, the analysis for this determination recognizes that it would be possible for multiple future developments to occur in local areas newly eligible to be built with no parking. In these areas, on-street parking demands would be likely to increase from the developments due to net increases in possible residential occupation on each development site that are estimated to range up to 6-12 dwelling units per site, as a worst case for this environmental impact analysis. As noted earlier, this estimate of added dwelling-unit yield potential is based on a Portland Oregon study that evaluated the implications of using different parking arrangements on numbers of buildable dwelling units. It also includes a factoring upward to represent Seattle's smaller minimum dwelling unit size. The potential for adverse on-street parking impacts in many cases would be subject to evaluation and disclosure in future project-level development reviews (SEPA or Land Use Code based), which would enable evaluating local on-street parking demands as they exist at that time and the nature of the development proposed, including factors such as the residential unit types and number of parking spaces proposed.

However, it is reiterated that City SEPA policies do not provide SEPA authority to mitigate the parking impact of development (other than for cumulative impact mitigation) on on-street parking availability in areas including Urban Centers (except within a portion of the University District Urban Center), the Station Area Overlay District, and in Urban Village areas that are within 1,320 feet (1/4 mile) of frequent transit service stops. This aspect of the policies is not proposed to be changed. This means that the City's land use and environmental impact policies and practices accept a high degree of on-street parking congestion in the frequent-transit-served areas as a consequence of promoting and accomplishing a development pattern, preferred by City policy, that emphasizes growth in Urban Centers and other areas within walking distance of frequent transit service.

Cumulative Impacts Related to the Proposal and Possible RPZ Program Changes

The City may propose reforms to the RPZ program, an SDOT program that primarily works to prevent commuters from major traffic generators to park in nearby residential areas. RPZs allow permit holders to park past the time limit otherwise set for the area or blockface. Up to four RPZ permits are provided per household (up to the number of vehicles available) and one guest permit. RPZ boundaries can change over time with a petition by residents and with a finding that the areas meet the RPZ program criteria.

Locations of current RPZs include: light rail station areas; vicinities near higher education institutions; portions of the Capitol Hill, First Hill, Squire Park (also known as Cherry Hill), Fremont, Wallingford, Roosevelt, Eastlake, Montlake, Ravenna, and Madison Valley neighborhoods; neighborhood edges adjacent the Uptown and University District Urban Centers; and near the Fauntleroy ferry dock.

SDOT is in the process of updating the RPZ Program, with a policy review underway. Possible RPZ program changes may include: permit pricing adjustments; permit limits per household;

increased performance monitoring and potential adjustments in RPZ boundaries and program operations; and potential tie-ins to future access and mobility investments. Much like SDOT's performance-based parking pricing program, these actions would help SDOT more closely manage the RPZ program. The potential changes could also allow for performance-related adjustments to address the variety of on-street parking needs in the affected neighborhoods.

The potential for cumulative transportation or parking impacts, resulting from the current parking proposal plus possible future RPZ program reforms, relates to the combined effects in how parking capabilities, demands, and patterns of on-street parking use might be affected. In many respects, the possible RPZ program changes appear likely to positively affect potential future conditions, in that future demands assumed created by RPZ permit allocation would be more tightly managed and assumed to possibly decrease in the short-term and possibly increase more slowly over time due to different permit limits per household and permit pricing changes. Also, the potential for RPZ boundaries to expand over time appears to allow for the extension of on-street parking management to more area, which in a positive sense allows for more availability of managed on-street parking supply for the use of permit holders who are likely in most cases to be area residents. Programmatically, the extension of RPZ boundaries and parking management can also lead to added rules or limitations on parking that are perceived by some affected parties to be inconveniences with an added potential for parking violations.

Over the long term, with future growth likely to occur in many RPZ areas, it is likely that on-street parking demand pressures would continue in several of the affected areas even with RPZ program improvements and with increased off-street parking capabilities encouraged by the current neighborhood parking proposal. With this proposal, it is also most likely that parking demand pressures would lead to more use of off-street parking resources, by residents with vehicles and by area visitors who could more extensively access off-street paid parking resources that would be available in the form of "flexible-use parking." While there would continue to be demand pressures put upon on-street parking resources and off-street parking, the likely future outcome, in terms of cumulative impacts, would be an increased overall capability for any given area affected by RPZs and this proposal to make efficient use of the combined on-street and off-street parking resources. That would be a positive impact. The worst-case potential for adverse cumulative transportation or parking impacts might arise if as-yet-unknown RPZ program management modifications might lead to removal of certain areas from RPZs, combined with future potential spillover on-street parking impacts from one or more future developments or other nearby parking demand generators. This could lead to increased competition for on-street parking if spillover demand is generated. While adverse, these kinds of impacts are not likely to generate significant adverse impacts, in part because they would be mitigated by the range of increased off-street parking capabilities, and possibly due to effects of RPZ program reforms (if an RPZ would remain in a nearby vicinity) that would result from implementing the proposal.

Transit Service Ridership and Occupancy Levels

To the extent the proposal leads to more future residents not owning cars and more residents living in areas with frequent transit service, additional ridership of transit services would be expected to occur. This would likely add to typical bus or train occupancy levels in peak and non-peak ridership periods. In the worst case, the additional cumulative burdens of added

ridership would generate adverse impacts on transit services. This might occur in the form of buses that are incrementally more crowded. Also, when buses are filled without additional standing room, the driver can skip later stops when there is not sufficient room to accommodate more riders. In these cases, the potential for future pass-by of riders would be another type of potential cumulative adverse impact. King County Metro has data on ridership and bus-capacity levels for many routes, of which six routes — the 5, 7, 41, and Rapid Ride C, D, and E routes — are discussed here as geographically-diverse examples of occupancy levels and potential adverse impacts. The seating and standing capacities in aisles of different models of Metro buses are factored into their measures of ridership's use of capacity on these routes based on multiple observations from buses throughout their service days. The observations are recorded by passenger-counting devices on the buses. Standing capacity is calculated using a factor of 4 square feet per person in standing areas of buses. Occupancy levels exceeding the calculated capacity threshold are considered by Metro to signal a need for additional allocation of buses to address those demands.

SDCI summarizes the capacity-usage data for the six sample routes in Figure 1.[18] The data show that for these sample routes except the 7, there are certain bus trips with occupancy levels that exceed 100% capacity (seated and standing) on average, with a greater likelihood of such trips in the heart of morning peak commute periods, but also some exceedances in afternoon peak commute periods. The routes with the greatest number of typical exceedances are the Rapid Ride C (West Seattle) and Rapid Ride E (Aurora) routes, which have approximately 9 and 11 exceedances of 100% capacity, respectively, out of approximately 228 individual bus trips on a typical weekday for the Rapid Ride C route, and 215 individual bus trips on a typical weekday for the Rapid Ride E route. The other routes with exceedances include the 5 (Greenwood) with three exceedances on average, the 41 (Lake City, Northgate) with two exceedances on average, and the Rapid Ride D (Ballard) with one exceedance on average during weekdays. These describe typical conditions based on numerous observations that are averaged in Metro's data. Also noted is a "sawtooth" pattern in the charting of varying degrees of occupancy in buses arriving one after another, at a frequency of approximately every 4-8 minutes in these routes during these times (see Figure 1). While this may represent natural variability in the data, it may also suggest that the bus service handles waves of demand that may favor certain bus timings more than others, and that if one bus is over-full the next one arriving, on average, is suggested by this analysis to be typically able to accommodate boarding passengers.

These data suggest that Metro should consider adding more buses to handle typical demands on certain routes such as the Rapid Ride C and E routes, for which these data provide information to help make those judgments. Adding buses depends on Metro's allocation of its bus and staffing resources, with program adjustments typically occurring twice each year.[19]

For purposes of this determination, the data suggest that Metro's bus capacity during peak periods can be challenged to meet demands for service on certain high-volume routes, with an intermittent pattern of overfilled buses. Accordingly, to the extent future growth through development in frequent-transit-proximate areas leads to increased transit ridership, it probably would contribute

[18] Source data from King County Metro, 2016. Analysis and interpretation by SDCI staff, 2016.
[19] King County Metro, J. Bez, 2017.

incrementally to high demands upon buses during peak commute periods. This is evaluated as a probable adverse transportation impact upon the bus system, but it is not concluded to be a significant adverse impact. The impacts can be addressed through future Metro operational decisions in its allocation of buses over time. The usage patterns also indicate that on average there is a degree of available capacity latent in the system even during peak bus use periods, due to the regularity of buses with capacity that arrive relatively soon after buses that are overfilled.

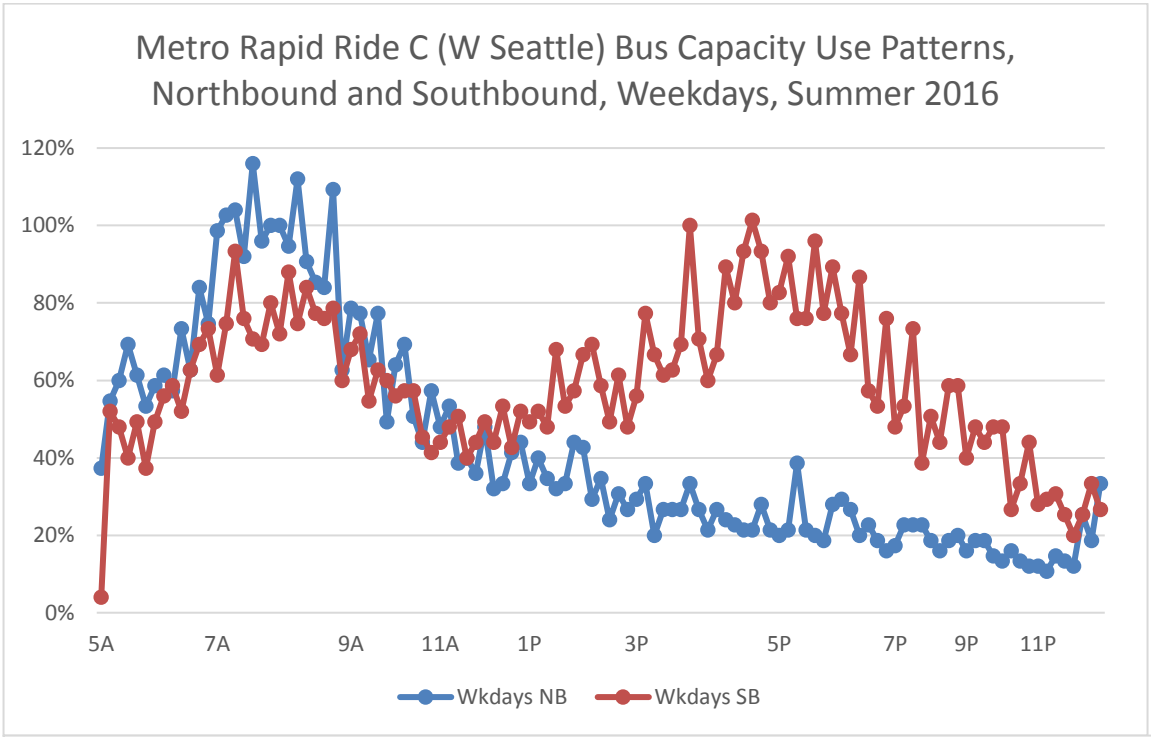
G. Surface Parking for Carshare Vehicles: Allowing for up to three off-street car share parking spaces in setbacks would help support individuals' ability to live without owning an automobile. This is likely to represent a positive transportation impact by reducing demand for on-street parking, and in making car share vehicles more visibly available and usable than if parked in garages or parked farther away from pools of customers, for example, residents of a given vicinity.

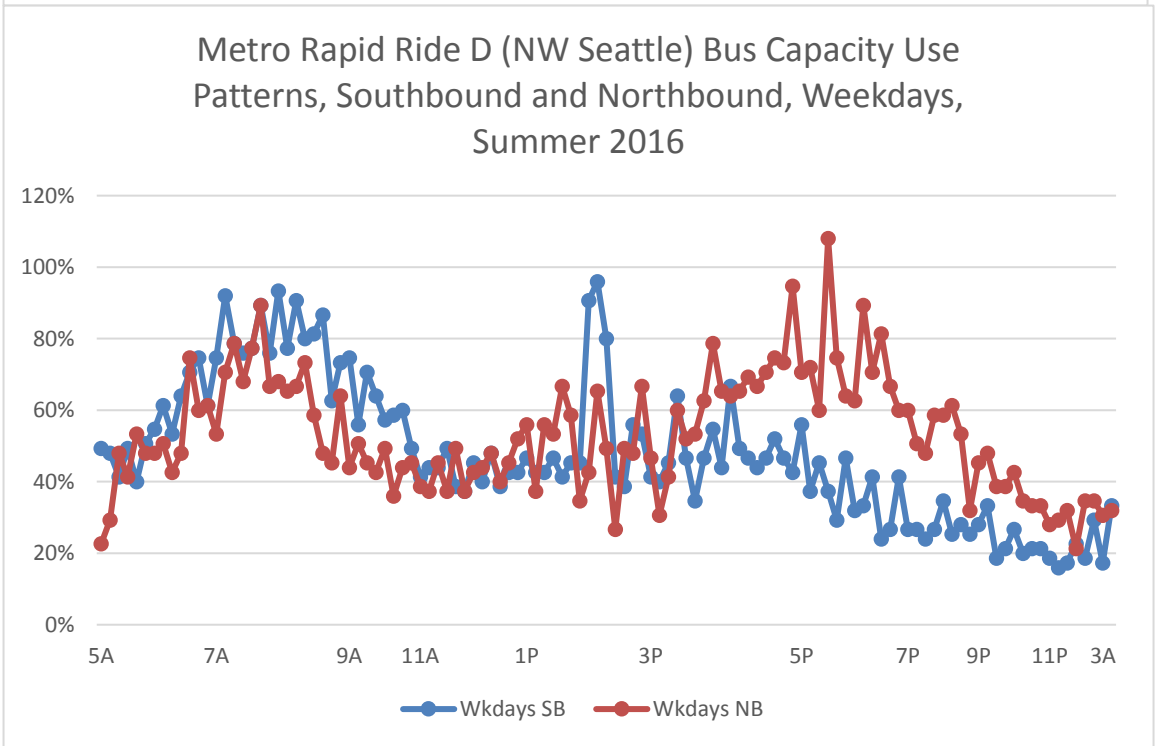
H. Minimum Parking Space Sizes: No adverse transportation or parking impact potential is identified for reinstating the code's minimum sizing of parking spaces provided, which were eliminated in 2012. Rather, it would address a pragmatic functional purpose for parking lots and garages by increasing the chances that the provided parking spaces will be sufficiently sized to handle the needs of likely users.

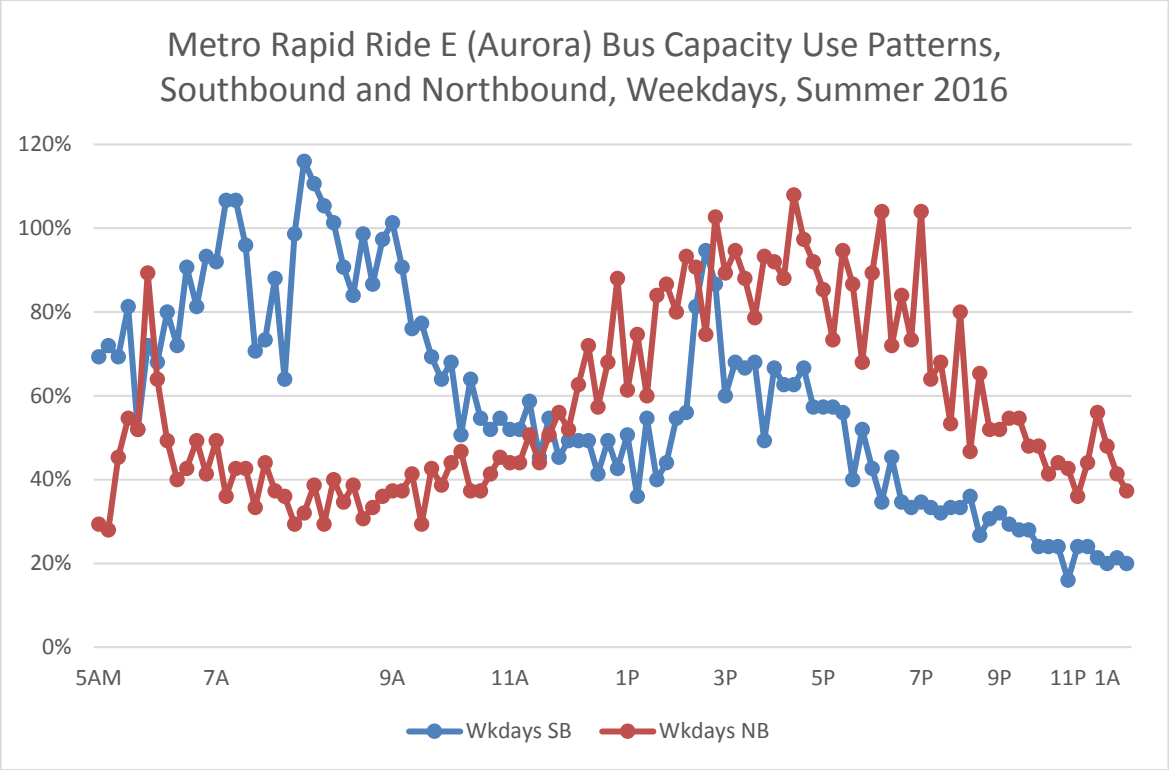
I. Update Bicycle Parking Requirements: No adverse transportation or parking impact potential is identified for updating minimum standards for providing bicycle parking. By providing for sufficient bicycle parking supply and ease of use, the likely net change in transportation choices would lead to slightly improved overall transportation system efficiency and a slightly lowered overall potential for adverse transportation impacts.

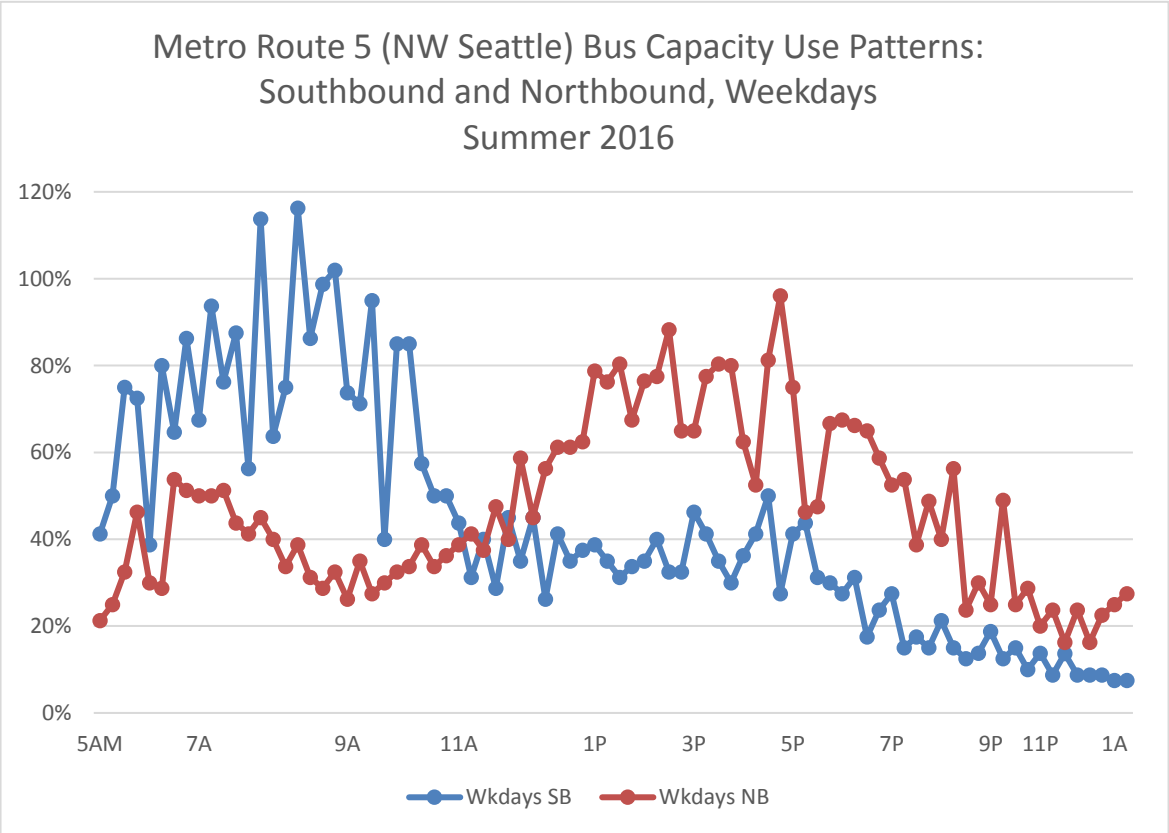
J. Allow park-and-ride facilities within garages as a permitted use: Like the discussion under Item A, the addition of a park-and-ride facility in an existing garage would add to local traffic volumes, but could potentially also reduce parking-search volumes in other local streets. This could occur to the extent that drivers would select to park in known off-street park-and-ride facilities rather than seek to park on the street in places near bus stops. Therefore, a potential for added traffic volumes on local streets is recognized as an adverse impact of this proposal, but its potential for impacts is, to some degree, lessened by the park-and-ride providing parking resources. Also, at the building hosting the use, the effect of the park-and-ride use would be experienced as vehicles entering and leaving the garage in the same manner as other garage-oriented vehicle activity, during morning and early evening hours, without a substantive adverse difference in manner of use than already permitted for a garage. Given the factors cited in this paragraph, significant adverse transportation or parking impacts are not anticipated.

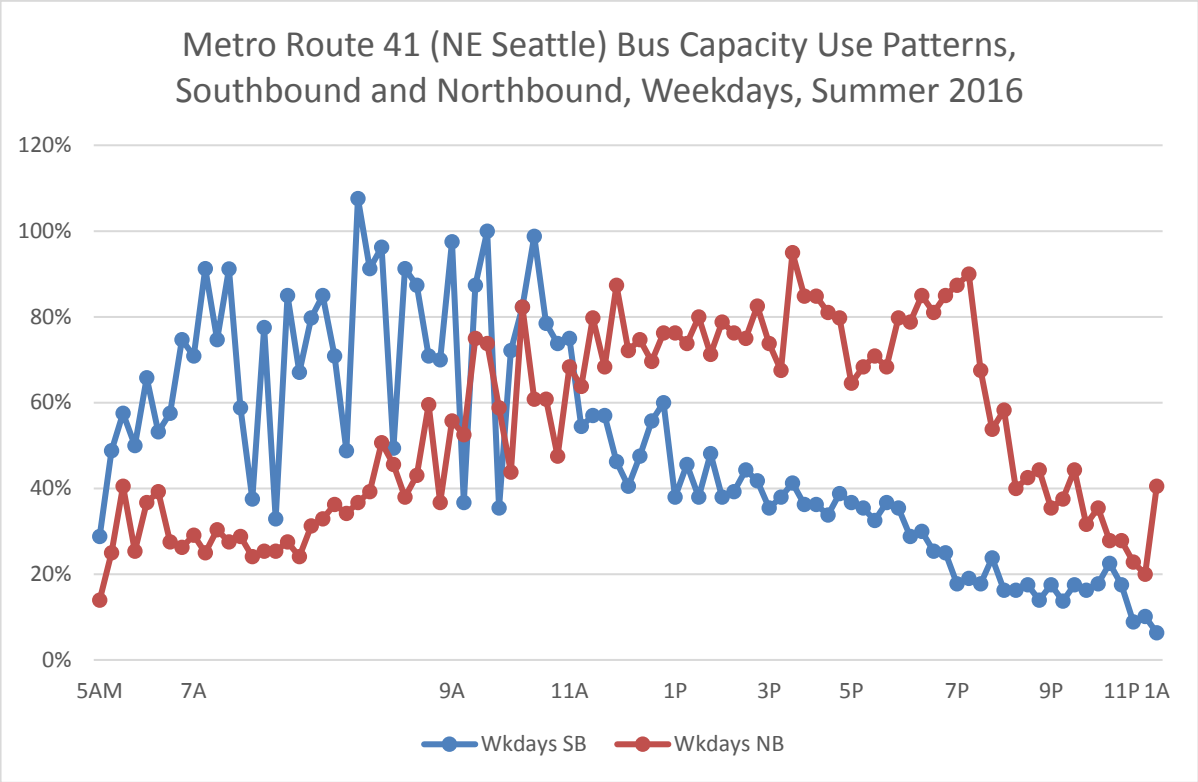
Figure 1
Bus Capacity Use Patterns on Six Sample Metro Bus Routes

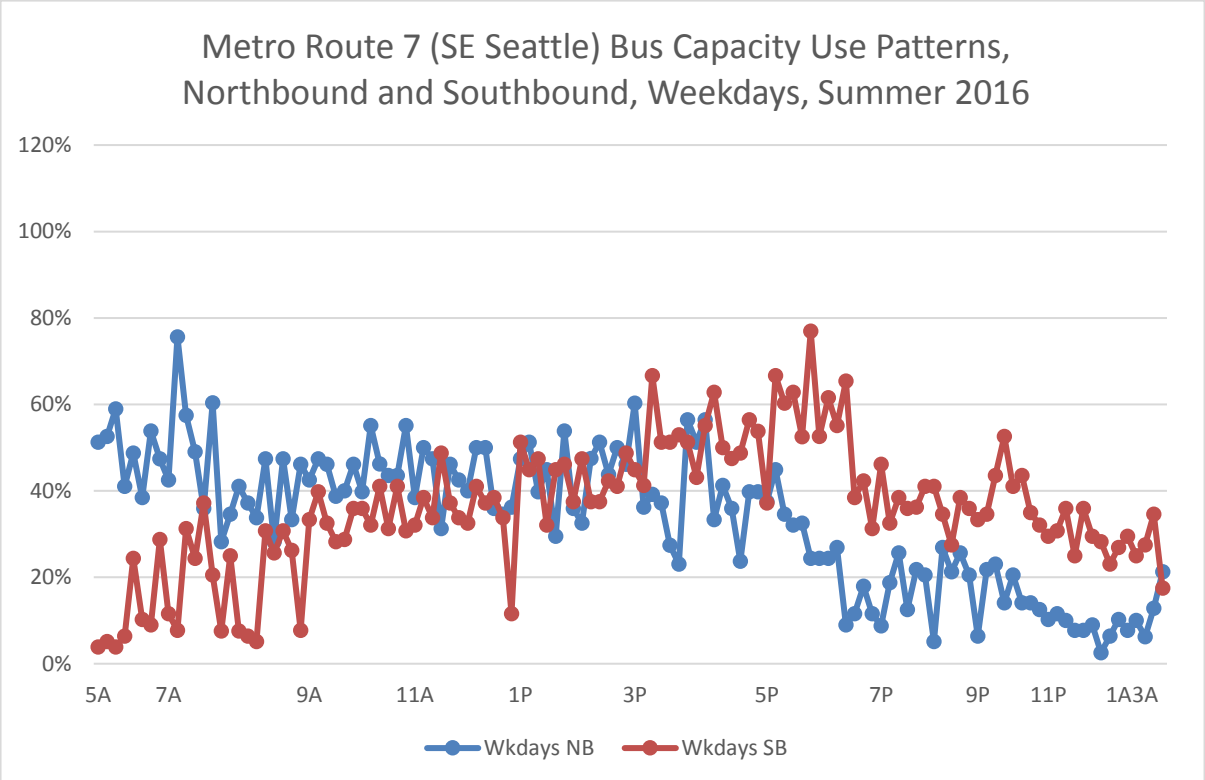





Metro Rapid Ride E (Aurora) Bus Capacity Use Patterns,
Southbound and Northbound, Weekdays, Summer 2016
120%
100%
80%
60%
40%
20%
0%
5AM
7A
9A
11A
1P
3P
5P
7P
9P
11P
1A
Wkdays SB
Wkdays NB


Metro Route 5 (NW Seattle) Bus Capacity Use Patterns:
Southbound and Northbound, Weekdays
Summer 2016
120%
100%
80%
60%
40%
20%
0%
5AM
7A
9A
11A
1P
3P
5P
7P
9P
11P
1A
Wkdays SB
Wkdays NB


Metro Route 41 (NE Seattle) Bus Capacity Use Patterns,
Southbound and Northbound, Weekdays, Summer 2016
120%
100%
80%
60%
40%
20%
0%
5AM
7A
9A
11A
1P
3P
5P
7P
9P
11P
1A
Wkdays SB
Wkdays NB


Metro Route 7 (SE Seattle) Bus Capacity Use Patterns,
Northbound and Southbound, Weekdays, Summer 2016
120%
100%
80%
60%
40%
20%
0%
5A
7A
9A
11A
1P
3P
5P
7P
9P
11P
1A
3A
Wkdays NB
Wkdays SB

K. Clarify parking rules and reduce parking minimums for income-restricted housing: Like findings of potential adverse impacts earlier in this element of the environment, there would be an incremental potential for increased demands for on-street parking, to the extent that future developments providing low amounts of parking would contribute to additional residents seeking to use on-street parking. However, this degree of added potential adverse impact would relate to the net difference between parking supplied in on-site or other off-site properties and the actual amount of parking demand generated by the use. In this case, the proposal recognizes that the target populations to be served (low-income households, disabled, and possibly elderly households) are likely to own vehicles at a low rate per household. Analogous to other research on younger households, parking demand could be as low as 0.3 parking spaces per dwelling unit or lower. It is also possible that caregivers and similar support personnel would generate an increment of parking demand. Because future parking demand from these developments can be projected to be relatively low, and with an anticipation that the developments in most cases are likely to provide a limited amount of parking on site in amounts that may exceed the minimum parking requirement, SDCI concludes that the potential magnitude of potential adverse impacts of spillover parking is likely to be low and not significant.

L. Require pedestrian door and access route. No adverse transportation or parking impact potential is identified for the proposed requirement of a pedestrian access door and route to a garage in new development. The accessibility to publicly usable garages from rights-of-way, which could include alleys, would benefit public users by ensuring usable and identifiable exits. This would be preferable to buildings where the building designs might provide only hard-to-find or inconvenient exit doors, or where all potential exits are secured in ways that cannot be used by the public. Ensuring this kind of access door is present would address access needs of future garage spaces that might serve the public. It would also help support the viability of enhanced shared parking systems in neighborhoods, which would help support better parking conditions over the long-term for residents of multiple buildings with parking needs served by one building, and for non-residential persons using parking.

M. Allow parking reductions to meet demands as shown by professional study. No adverse transportation or parking impact potential is identified from this proposed item, because accommodating a reduced parking amount that matches projected parking demands would not be likely to create differential adverse impacts. In other words, the future outcomes affected by this item would not generate significant potential for spillover traffic or parking impacts because projected supply would be anticipated to meet projected parking demand.

N. Unbundling parking. No significant adverse transportation or parking impact potential is identified from this proposed item, due to the increased efficiencies in choices made by individuals to live without owning an automobile in a given location. To the extent this occurs, parking provided in future development could be better tailored in amounts to serve likely demands, less overall traffic volumes from a development would be likely (compared to a development not using this proposed unbundling), and the availability of flexible-use parking (another outcome of the overall parking proposal) could contribute toward positive outcomes in terms of transportation and parking impacts. Similarly, giving the option for commercial

tenants to lease less parking could lead to more efficient transportation choices made by employers, employees and others, and could lead to more parking spaces available for flexible parking uses.

O. Changes to SEPA parking policy. The proposal updates policy discussions by referring to other existing City policy directions related to growth and transportation that are drawn from the current City Comprehensive Plan *Seattle 2035*, and adds new types of parking mitigation strategies. The parking policy would continue to support the existing policy that does not provide SEPA authority for parking impact mitigation (other than for cumulative impact mitigation) in certain portions of the city. At the same time, the proposal retains the existing orientation of the SEPA policy to allow for cumulative impact mitigation and for the possibility of parking impact mitigation for proposals in other portions of the city, including portions that are not within Urban Centers (except for a portion of the University District Urban Center) or the Station Area Overlay District, and not within frequent transit service areas. Thus, the proposed changes to this policy wording would not be expected to generate built environment impacts, directly or indirectly, due to only a minimal level of revision in the meaning of the policies. This includes in relation to transportation and parking elements. To the extent that additional use of new parking-mitigation strategies occurs, increased use of vehicle-sharing and mobility-choice methods is anticipated to generate degrees of positive environmental impact by accommodating methods of transportation that would have parking impact-mitigating value through possible permit conditioning of future development proposals.

Public Services, Utilities

Indirectly, the range of actions anticipated in the proposal would tend to have minimal implications for adversely affecting public services and utilities elements of the environment. Several of the changes would lead to greater efficiencies in transportation and parking activities that would not be likely to result in significant adverse impacts on providing police or fire protection, parks quality or provision, or providing school services or other public services. This is due to a lack of relevant or substantive relationship to these services and parking, and the fact that efficient parking is already supported by the Land Use Code. Regardless of the recommended changes, public safety services like parking enforcement on city streets would continue, and fire safety would continue to be enforced by the fire department and SDCI. Fire and Police department contacts did not identify substantive fire code or operational issues due to this proposal (SFD, SPD, 2016). Potential effects related to water/sewer/drainage utilities would largely relate to drainage-related water quality/quantity implications that are discussed under the natural environment heading. Seattle Public Utility contacts did not identify substantive adverse issues due to this proposal.[20] Therefore, no adverse impact implications of the entire proposal's elements are identified for public services and utilities.

[20] Seattle Public Utilities, 2016.

DECISION

[X] Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(c).

[ ] Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

Signature: (on file) Date: Sept. 14, 2017
William Mills, Strategic Advisor 2
Seattle Department of Construction and Inspections